

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

_____ DONNA GABERT, Plaintiff,)	
)	
)	
v.)	C.A. No.: 1:21-cv-00202-LM
)	
DOLLAR TREE STORES, INC.,)	
_____ Defendant.)	

**ASSENTED-TO MOTION OF DEFENDANT DOLLAR TREE STORES, INC. FOR
ENTRY OF A PROTECTIVE ORDER**

Now comes defendant Dollar Tree Stores, Inc. (“Dollar Tree”) and, with assent of plaintiff Donna Gabert (“Plaintiff”), hereby moves this Court pursuant to Fed. R. Civ. P. 26(c) for the entry of a protective order against the unrestricted disclosure and use of confidential, proprietary, and trade secret documents and information in this matter. As grounds therefore, Dollar Tree states that discovery in this matter is likely to include information and/or documents regarding non-public, financial information such as the terms and conditions contained in a commercial lease as well as Dollar Tree’s internal corporate policies and procedures. Accordingly, Dollar Tree seeks entry of the attached protective order, attached hereto as Exhibit A.

WHEREFORE, for the reasons set forth above, defendant Dollar Tree Stores, Inc. respectfully requests, with assent of plaintiff Donna Gabert, that this Court enter the proposed protective order in this matter.

STATEMENT PURSUANT TO L.R. 7.1(a)(2)

Defendant Dollar Tree Stores, Inc. states it is not submitting a memorandum of law, as generally required under L.R. 7.1, because this motion is assented-to by all parties and does not raise any substantive, disputed issues of law.

Respectfully submitted,
Defendant,
DOLLAR TREE STORES, INC.
By its attorneys,

/s/ Matthew J. Lynch
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CERTIFICATE OF SERVICE

I, Matthew J. Lynch, do hereby certify that on this 30th day of March 2021, I served a copy of this document to all counsel of record via the Court's ECF system.

/s/ Matthew J. Lynch
Matthew J. Lynch